



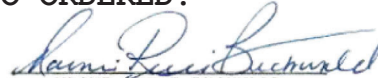
December 28, 2022

**Via ECF and Email**

District Judge Hon. Naomi Reice Buchwald  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street, Courtroom 21A  
New York, New York 10007-1312

The case is stayed for 20 days. By January 19, 2023, the parties are directed to file a stipulation of dismissal with prejudice or a joint status report.

**SO ORDERED.**

  
NAOMI REICE BUCHWALD  
UNITED STATES DISTRICT JUDGE

Dated: New York, New York  
December 30, 2022

Re: *Rachel Carol Filsoof v. Andrew J. Cole.*, Case No. 21-cv-1791-NRB  
Joint Motion to Stay Proceedings to Finalize Settlement

Dear Judge Buchwald:

We represent the Plaintiff, Rachel Filsoof in this action. We hereby submit this joint motion to stay proceedings for 30 days in order to permit the parties to finalize the drafting of a settlement agreement, in light of a settlement term sheet that has been agreed to by the parties.

We are happy to report to the Court that the parties' counsel have worked hard to reach a settlement term sheet that has been approved by both parties to this action. While the term sheet is designated as non-binding and requires a fully executed settlement agreement, the parties' counsel are confident that they will promptly finalize a formal settlement agreement and that both parties will promptly execute the same. That being said, by filing this joint letter, counsel understand and expect that the Court may and should treat the term sheet as binding and hold the parties to their commitments and to take steps to prevent one side or the other from abandoning this settlement without good cause.

There are pressing deadlines in this action that we respectfully submit would divert resources and attention from finalizing the formal settlement agreement, including expert opposition reports, and the Court's direction to plaintiff to provide additional information concerning residence/domicile. To enable counsel to fully focus on finalizing a formal settlement agreement tracking the agreed-to term sheet, the parties jointly request that the Court stay this proceeding for 30 days, upon which counsel shall update the Court as to the status of the settlement and the expected stipulation of dismissal with prejudice contemplated by the settlement.

In light of the above, the parties hereby jointly request that all deadlines in this action be stayed for 30 days, and that no later than 30 days from such stay, the parties jointly update the Court on the status of the final settlement agreement and the stipulation of dismissal with prejudice.

We thank Your Honor for your consideration.

Respectfully submitted,

/s/ Tom M. Fini

Tom M. Fini, Esq.

cc: All counsel of record